

FRANK LLP
ATTORNEYS AT LAW

305 BROADWAY
SUITE 700
NEW YORK, NY 10007
212 682 1853
212 682 1892 FAX
gfrank@frankllp.com
www.frankllp.com

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VIA ECF

Hon. Barbara Moses, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl St., Room 740
New York, NY 10007

Re: Michelo et al. v. Nat'l Collegiate Student Loan Trust 2007-2 et al., 18-CV-1781 (PGG)
Bifulco et al. v. Nat'l Collegiate Student Loan Trust 2004-2 et al., 18-CV-7692 (PGG)

Dear Judge Moses:

We represent Plaintiffs in the above-referenced actions, and write pursuant to Rule 3 of this Court's Individual Practices. TSI employee-witness "Affiant X" recently filed a motion for a protective order excusing him/her from deposition pursuant to Rule 26(c). (Dkt. No. 266 in Case No. 18-cv-1781; Dkt. No. 196 in Case No. 18-cv-7692).

The motion was filed under seal, simultaneously with a publicly filed letter to Your Honor asserting that Affiant X's identity, and the nature of the purported medical condition allegedly requiring preclusion of this individual's deposition, must be kept confidential. (Dkt. No. 265 in Case No. 18-cv-1781; Dkt. No. 195 in Case No. 18-cv-7692).

In light of the confidentiality assertion, but without admitting any of the assertions within the motion (or prior filings to block the deposition), Plaintiffs now file under seal the following: (1) Plaintiffs' motion for sanctions against TSI for discovery violations concerning Affiant X's deposition, and (2) Plaintiffs' brief in response to the recent Rule 26(c) motion.

The sealed filing will appear on ECF shortly. We will ensure counsel of record receive unsealed copies of these papers.

Respectfully submitted,

/s/ Gregory A. Frank

cc: All Counsel of Record (via ECF)